UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-2(c)

FOX ROTHSCHILD LLP

(Formed in the Commonwealth of Pennsylvania)

Raymond T. Lyons, Esquire Samuel H. Israel, Esquire Martha B. Chovanes, Esquire Princeton Pike Corporate Center 997 Lenox Drive, Building 3

Lawrenceville, NJ 08648-2311

Tel: (609) 896-3600; Fax: (609) 896-1469

rlyons@foxrothschild.com sisrael@foxrothschild.com mchovanes@foxrothschild.com

Attorneys for Ezra Beyman

VENABLE LLP

Gregory A. Cross (pro hac vice) 750 East Pratt Street, Suite 900 Baltimore, Maryland 21202

Tel: (410) 244-7400 Fax: (410) 244-7742 gacross@venable.com

- and -

VENABLE LLP

Patrick J. Boyle

Rishi Kapoor (pro hac vice)

1270 Avenue of the Americas, 24th Floor

New York, New York 10020

Tel.: (212) 307-5500 Fax: (212) 307-5598 pjboyle@venable.com rkapoor@venable.com

Attorneys for Petitioners GECMC 2006-C1 Carrington Oaks, LLC, COMM 2006-C8 Coveside Lane, LLC, and BACM 2006-

4 Inverness Apartments, LLC

In re:

EZRA BEYMAN,

Case No.: 14-28775 (CMG)

Involuntary Chapter 7

Putative Debtor.

Judge: Hon. Christine M. Gravelle

## JOINT STIPULATION DISMISSING INVOLUNTARY PETITION

Putative Debtor Ezra Beyman ("Mr. Beyman"), by and through his attorneys of record Fox Rothschild LLP, and petitioning creditors BACM 2006-C4 Inverness Apartments, LLC ("Inverness"), COMM 2006-C8 Coveside Lane, LLC ("Coveside"), and GECMC 2006-C1 Carrington Oaks, LLC ("Carrington", and collectively with Inverness and Coveside, the "Petitioning Creditors"; Putative Debtor and Petitioning Creditors shall collectively be referred Case 14-28775-CMG Doc 84 Filed 09/08/15 Entered 09/08/15 09:37:42 Desc Main Document Page 2 of 3

to as the "<u>Parties</u>"), by and through their attorneys Venable LLP, submit this joint stipulation consenting to and requesting the dismissal of the above-captioned involuntary bankruptcy.

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the Putative Debtor and the Petitioning Creditors, as follows:

- 1. Mr. Beyman and each of the Petitioning Creditors consent to the dismissal of the Involuntary Petition against Putative Debtor filed on September 12, 2014 (the "Involuntary Petition"), and the above-captioned involuntary bankruptcy case, without prejudice and without costs to either party.
- 2. Mr. Beyman expressly waives any and all right to relief or judgment under 11 U.S.C. § 303(i), including without limitation any right to seek or recover costs, attorneys' fees, damages, and/or punitive damages incurred or caused as a result of or in connection with the above-captioned involuntary bankruptcy case.
- 3. Pursuant to 11 U.S.C. § 303(j)(2), Mr. Beyman and Petitioning Creditors hereby jointly request that the Court enter an order dismissing the Involuntary Petition after notice of this Joint Stipulation is served on Mr. Beyman's creditors and, to the extent any party in interest objects to such relief, a hearing is held before the Court on the Parties' request for dismissal of the Involuntary Petition.
- 4. Mr. Beyman shall be responsible for providing notice of this Joint Stipulation and a hearing on the Parties' request for dismissal of the Involuntary Petition to his creditors.
- 5. Mr. Beyman hereby certifies that he has filed the list of all of his known creditors and their mailing addresses pursuant to Fed. R. Bankr. P. 1017 under ECF No. 83.

[remainder of page intentionally left blank]

## Case 14-28775-CMG Doc 84 Filed 09/08/15 Entered 09/08/15 09:37:42 Desc Main Document Page 3 of 3

Date: September 8, 2015

FOX ROTHSCHILD LLP

By: <u>/s/ Raymond T. Lyons</u>

Raymond Lyons Samuel H. Israel Martha B. Chovanes Princeton Pike Corporate Center 997 Lenox Drive, Suite 300 Lawrenceville, NJ

Telephone: (609) 896-3600 Facsimile: (609) 896-1469

Attorneys for Ezra Beyman, Putative Debtor

VENABLE LLP

By: <u>/s/Rishi Kapoor</u>
Gregory A. Cross (*pro hac vice*)
750 East Pratt Street, Suite 900
Baltimore, Maryland 21202

Tel: (410) 244-7400 Fax: (410) 244-7742 gacross@venable.com

- and -

Patrick J. Boyle, Esq.

Rishi Kapoor, Esq. (pro hac vice)

1270 Avenue of the Americas, 24th Floor

New York, New York 10020

Tel.: (212) 307-5500 Fax: (212) 307-5598 pjboyle@venable.com rkapoor@venable.com

Attorneys for Petitioning Creditors GECMC 2006-C1 Carrington Oaks, LLC, COMM 2006-C8 Coveside Lane, LLC, and BACM 2006-4 Inverness Apartments, LLC